



Amy L. Alvarez
District Manager
Federal Government Affairs

Suite 1000
1120 20th Street, NW
Washington DC 20036
202-457-2315
FAX 202-263-2601
email: alalvarez@att.com

April 11, 2003

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

Re: Application by SBC Communications Inc., Michigan Bell Telephone Company, and Southwestern Bell Communications Service, Inc. for Provision of In-Region InterLATA Services in Michigan, WC Docket No. 03-16

Dear Ms. Dortch:

This letter supplements the record on the efforts by AT&T and Covad to provide line splitting services to Michigan consumers and SBC's inability to provision line splitting orders. AT&T has previously shown that SBC's process for converting line splitting customers to a UNE-P voice only configuration is discriminatory and unworkable. *See, e.g., DeYoung/Connolly Dec. ¶¶ 20-21; DeYoung/Connolly Supp. Dec. ¶¶ 6-15.* As the attachment hereto shows, despite SBC's representations that this type of conversion will result in minimal service disruption, AT&T's experience in Michigan confirms that this type of conversion results in significant voice disruption. Thus, it is clear that SBC does not have functioning OSS processes to handle line splitting orders.

One electronic copy of this Notice is being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in black ink that reads "Amy L. Alvarez".

cc: John P. Stanley
Gina Spade
Marcus Maher
Susan Pié

**SBC's Inability to Process Line Splitting Orders
Results in Customer Losing Voice Service For Over Two Days**

- AT&T has previously submitted evidence on the problems with SBC's line splitting documentation and SBC's inability to provision line splitting orders that AT&T has submitted in Michigan. *See* DeYoung/Connolly Dec. ¶¶ 5-21; DeYoung/Connolly Supp. Dec. ¶¶ 3-27. Letter from Alan C. Geolot, Sidley Austin Brown & Wood LLP, to Marlene H. Dortch, Secretary, FCC (March 19, 2003); Letter from Alan C. Geolot, Sidley Austin Brown & Wood LLP, to Marlene H. Dortch, Secretary, FCC (March 28, 2003) ("AT&T March 28 Ex Parte").
- In the AT&T March 28 Ex Parte, AT&T described its effort to convert a customer's AT&T/Covad line splitting service to remove the DSL service but retain UNE-P service. AT&T March 28 Ex Parte at 7. Pursuant to SBC's procedures, this order involves completion of a single LSR that results in two separate orders in SBC's systems (a "D" (disconnect) order for the DSL loop and a "N" (new) order for a new voice-grade loop and port combination with reuse of the switch port). AT&T followed SBC's documentation to submit the order on March 24, 2003. However, SBC erroneously rejected this order due to errors in its documentation. Thereafter, AT&T resubmitted the order, which was given a due date of April 3, 2003.
- On April 3, the customer lost dialtone. AT&T contacted SBC's LSC on April 4 and learned that for some reason SBC had worked a portion of one of the orders (i.e. had disconnected the cross connects from the switch port to the existing DSL loop), but not the other order associated with the conversion. Also on April 4, SBC placed the order in jeopardy status even though the due date (and therefore the time for issuing jeopardy notifications) had passed. Although SBC Local Operations Center ("LOC") representatives told AT&T that the service would be restored by 5:00 that afternoon, SBC failed to restore dialtone by close of business on Friday, April 4.
- Service was briefly restored around midnight April 4, but the customer had no dialtone when he tried to place a call again early Saturday morning, April 5. Despite a further commitment by SBC to restore dialtone later that day, the customer did not regain voice service until Sunday afternoon, April 6. Moreover, dialtone was only restored that day after AT&T escalated the outage to SBC's Local Service Center/LOC Vice President.
- During the entire period that the customer had no dialtone -- from Thursday to Sunday -- the customer's DSL service continued to operate. As a result, the customer had DSL service but not voice service -- precisely *the opposite* of what had been requested.
- Thus, AT&T's customer experienced far more than the brief interruption in voice service that SBC has represented would be associated with this type of conversion. The loss of dialtone for over three days (in conjunction with the failure to disconnect

the DSL service) is clear evidence that SBC has not established workable OSS processes for handling line splitting orders.

- As AT&T has also shown, SBC's current policy requiring that CLECs order a new loop in a line splitting to UNE-P configuration, while at the same time re-using the same loop when its customers of its own data affiliate drop their DSL service, is pure discrimination. SBC has provided no justification for the difference in treatment, and the consequence of the policy is that CLEC customers incur unnecessary voice outages and potentially lower service quality, and CLECs incur unnecessary work and charges associated with the new loop provisioning. AT&T March 28 Ex Parte at 5-6.
- Recently, in discussions between AT&T and its SBC account team, SBC personnel have admitted that SBC's policy of giving CLECs a new voice-grade loop in a line splitting-to-UNE-P conversion is nothing more than an effort to preserve DSL-capable loops for customers that want DSL service. This candid admission reveals the anti-competitive motive behind SBC's policy and belies SBC's previous claim that its policy is based on a concern that the line-split loop needs to be switched out because it may not be suitable for Michigan Bell's voice quality standards.